

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. Nos. 25704 & 25738

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' ONE HUNDRED
SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED
AND/OR UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On September 25, 2024, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the *Debtors’ One Hundred Seventh (Substantive) Omnibus Objection to Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 25704, redacted & 25738, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection attached to the Objection [D.I. 25704-1 & 25738-1], any responses to the Objection were to be filed no later than November 11, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

3. The FTX Recovery Trust received informal responses (the “Informal Responses”) to the Objection from the holders of claim numbers 87552, 45165, 50305, 80626, 47066, 83615,

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

56199, 51278 and 83306.

4. On November 6, 2024, Vishal Bathla (“Bathla”) filed a response to the Objection [D.I. 27733] (the “Bathla Response”).

5. On November 13, 2024, 3Sigma Capital LLC (“3Sigma”) filed a response to the Objection [D.I. 27912] (the “3Sigma Response”).

6. On November 13, 2024, Timothy L. Pitcher II (“Pitcher”) filed a response to the Objection [D.I. 27942] (the “Pitcher Response”).

7. On November 19, 2024, Maria Arantzazu Gomez Madrazo (“Madrazo”) filed a response to the Objection [D.I. 28064] (the “Madrazo Response”).

8. On November 20, 2024, Tawnee McCluskey (“McCluskey”) filed a response to the Objection [D.I. 28065] (the “McCluskey Response”).

9. On February 10, 2025, Raviv Jackier (“Jackier”) filed a late response to the Objection [D.I. 29548] (the “Jackier Response”).

10. As of the Date hereof, no other responses to the Objection have been filed or served on the FTX Recovery Trust.

11. The FTX Recovery Trust resolved the response to the Objection from holder of claim number 45165 without modification to the schedule attached to the proposed form of order.

12. The FTX Recovery Trust has agreed to revise the proposed form of order attached to the Objection to resolve the McCluskey Response and the Informal Responses from the holders of claim numbers 47066, 80626, 84200, and 87552.

13. The FTX Recovery Trust is withdrawing the Objection solely with regard to Pitcher’s claim, Madrazo’s claim, Jackier’s claim, and claim numbers 85, 19453, 24806, 33003, 33921, 45672, 48364, 49492, 50305, 50809, 59752, 61778, 62849, 91821, and 80289 without

prejudice and with all rights of the parties reserved with regard thereto.

14. The FTX Recovery Trust has revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as Exhibit A, to reflect the above withdrawals and the adjournment of the Objection solely as to the Bathla and 3Sigma claims and claim numbers 83615, 56199, 51278 and 83306. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as Exhibit B. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

15. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: April 8, 2025
Wilmington, Delaware

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